

**DOCKET FILE COPY ORIGINAL  
BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, DC 20554**

**April, 2004**

**RECEIVED & INSPECTED**

**MAR 18 2004**

**FCC - MAILROOM**

In the matter of	)	
	)	
Amendment of CFR section 73.202(b)	)	MB-Docket No. 04-33
Table of Allotments	)	RM-10847
FM Broadcast Stations	)	

**COUNTER PROPOSAL**

The following technical exhibit, and petition for counter proposal, has been prepared by, and on behalf of, Clyde Scott Jr., D.B.A. EME Communications (EME), 293 JC Saunders Road, Moultrie, Georgia 31768. The purpose is to counter propose the action filed by West Com Corp. This action would also allot channel 252A to Coolidge, Georgia as that community's first local service.

The proposed action seeks to amend the FM Table of Allotments by upgrading Channel 251A, Station WMRZ, to Channel 251C3. Since this upgrade would be short spaced to Channel 252A, Station WQXZ, Cordele, Petitioners propose to realLOT Channel 252A, Station WQXZ, from Cordele to Pinehurst, Georgia. EME fully supports the proposed action.

Offered, as exhibit 1, is a spacing study with station WQXZ operating at the proposed new tower site and re-allocated to Pinehurst, Georgia. This exhibit clearly shows clear area to locate channel 252A to Coolidge with the proposed 70 dBu contour totally encompassing the city without terrain obstruction. Offered as exhibit 2 is a plot showing the proposed coverage. EME also recognizes a CP for a L1 on channel 251 at Thomasville, GA and an Application for a L1 on channel 252 in Moultrie, Georgia. Considering these facilities are secondary services, they were not considered in this proposal.

Coolidge is located in Thomas County Georgia and is listed by the United States Census Department. The 2000 population of Coolidge was 552 persons. Coolidge is an incorporated city with an active city government including an elected mayor and city council members, Police, Fire, cable television and Water services. Coolidge also has several churches and businesses and is served by its own local post office (31738). Coolidge is not located within any recognized urbanized area. Attached is the data from the U.S. Census Bureau That shows the 2000 census data for Coolidge, Georgia.

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Granting this counterproposal would provide new service to 69,057 persons, as outlined in exhibit 2B, and provide Coolidge, Georgia with it's first local service.

It is respectfully requested the Commission amend the FM Table of Allotments, Section 73.202(b) of the Commission's rules, with respect to the communities listed below, as follows:

<u>City</u>	<u>Channel Nos.</u>	
	<u>Present</u>	<u>Proposed</u>
Dawson, Georgia	251A	251C3
Cordele, Georgia	252A	-----
Pinehurst, Georgia	-----	252A
Coolidge, Georgia	-----	252A

### **Conclusion**

Accordingly, Clyde Scott, Jr. respectfully request that this Counterproposal be accepted and considered a part of this proceeding, and the table of Allotments be modified as outlined above. Once channel 252A is allotted to Coolidge, Clyde Scott, Jr. will file an application or participate in the FCC's auction process, and once granted a construction permit, build and operate the facility.

Respectfully submitted:



Clyde Scott, Jr.  
EME Communications  
293 JC Saunders Road  
Moultrie, GA 31768  
229-890-2506  
229-985-0864 Fax  
[cscott@emecom.com](mailto:cscott@emecom.com)

## EXHIBIT - 1

CLASS = A

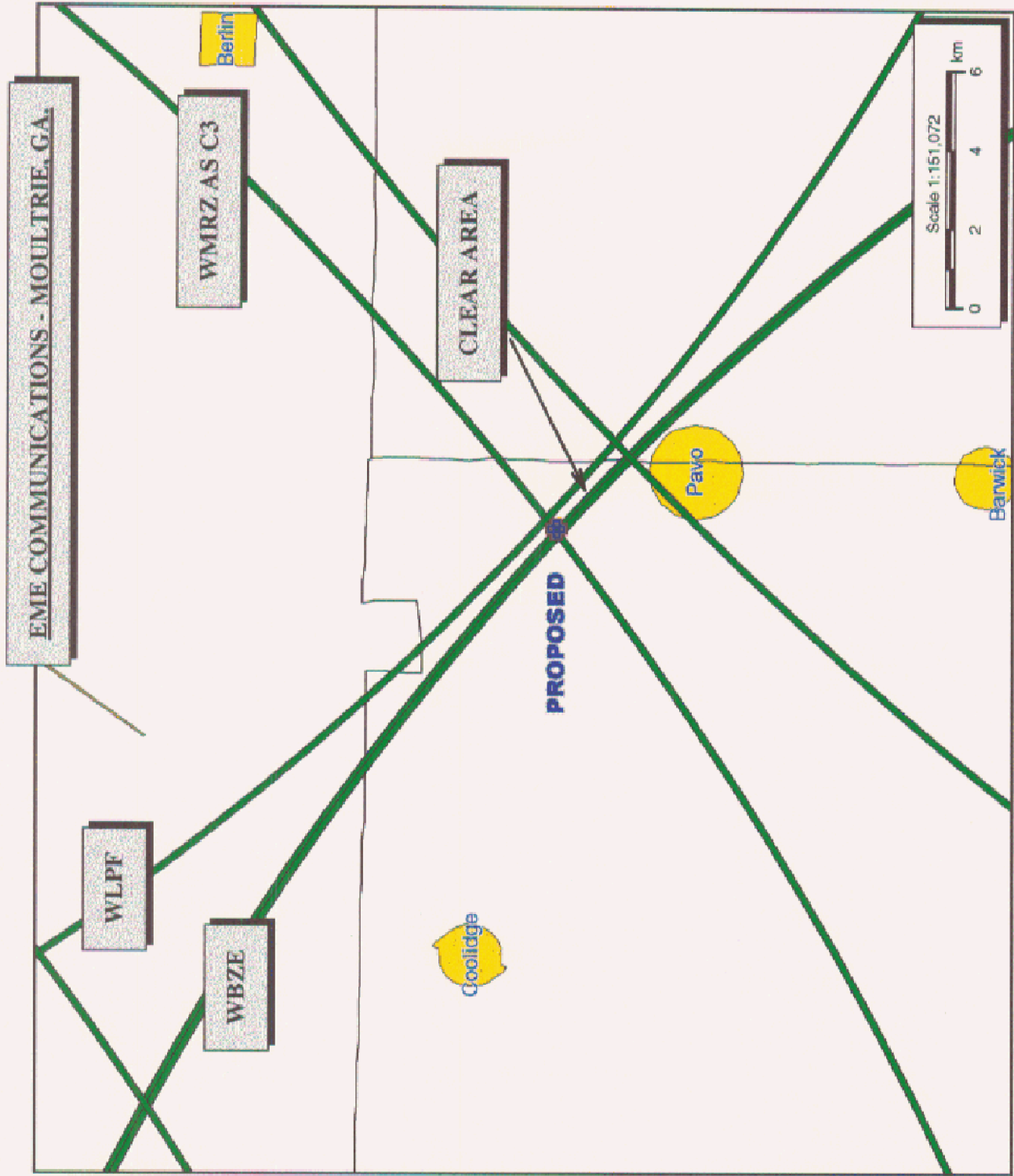
## Current Spacings

Channel 252 - 98.3 MHz

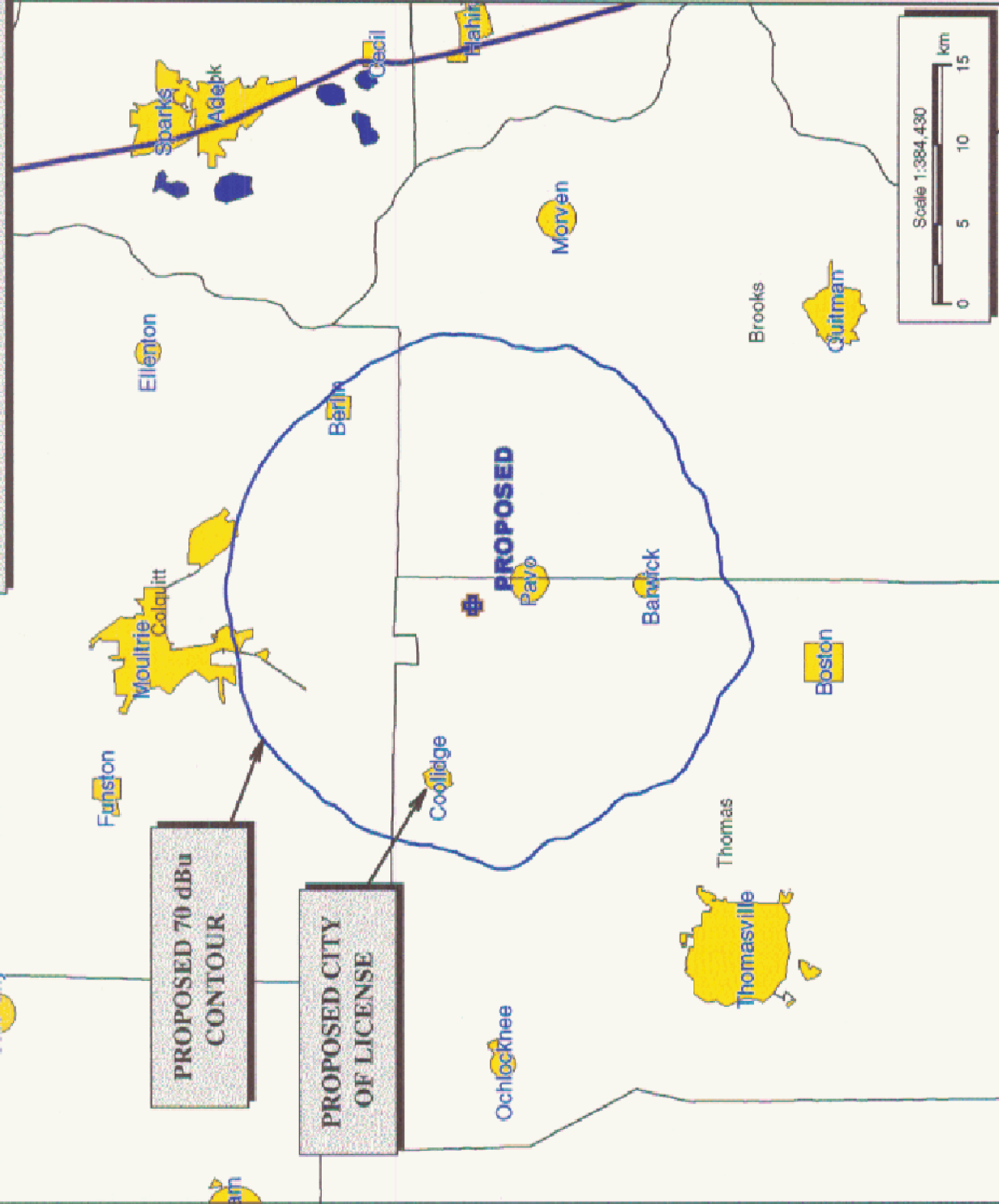
Call	Channel		Location		Dist	Azi	FCC	Margin
RADD	ADD	251C3	Dawson	GA	89.02	322.2	89.0	0.02
WBZE	LIC	255C1	Tallahassee	FL	75.03	222.6	75.0	0.03
WBZE.C	CP	255C1	Tallahassee	FL	75.14	222.5	75.0	0.14
WLPP	LIC-Z	253A	Ocilla	GA	72.35	42.6	72.0	0.35
WQHLFM	LIC	251C2	Live Oak	FL	108.63	135.9	106.0	2.63
RADD	ADD	252A	Pinehurst	GA	130.88	5.0	115.0	15.88
RDEL	DEL	251A	Dawson	GA	89.02	322.2	72.0	17.02
WFSY.C	CP	253C0	Panama City	FL	174.41	252.6	152.0	22.41
WFSY	LIC	253C0	Panama City	FL	174.60	252.6	152.0	22.60
WMRZ.C	CP	251A	Dawson	GA	104.99	319.1	72.0	32.99
WGCO	LIC	252C1	Midway	GA	237.99	72.5	200.0	37.99
RDEL	DEL	249A	Ocilla	GA	71.63	33.7	31.0	40.63
WKAA	LIC-N	249A	Ocilla	GA	71.63	33.7	31.0	40.63
WJZT.C	CP	250A	Woodville	FL	76.58	205.7	31.0	45.58
WBTY	LIC	254A	Homerville	GA	85.06	86.6	31.0	54.06

**PROPOSED**  
**COOLIDGE, GEORGIA**  
 Latitude: 30-59-30 N  
 Longitude: 083-45-12 W  
 ERP: 6.00 kW  
 Channel: 252  
 Frequency: 98.3 MHz  
 AMSL Height: 171.589 m  
 Elevation: 76.1 m  
 Horiz. Pattern: Omni  
 Vert. Pattern: No  
 Prop Model: None

**EXHIBIT - 1B**



# EME COMMUNICATIONS - MOULTRIE, GA.



## PROPOSED

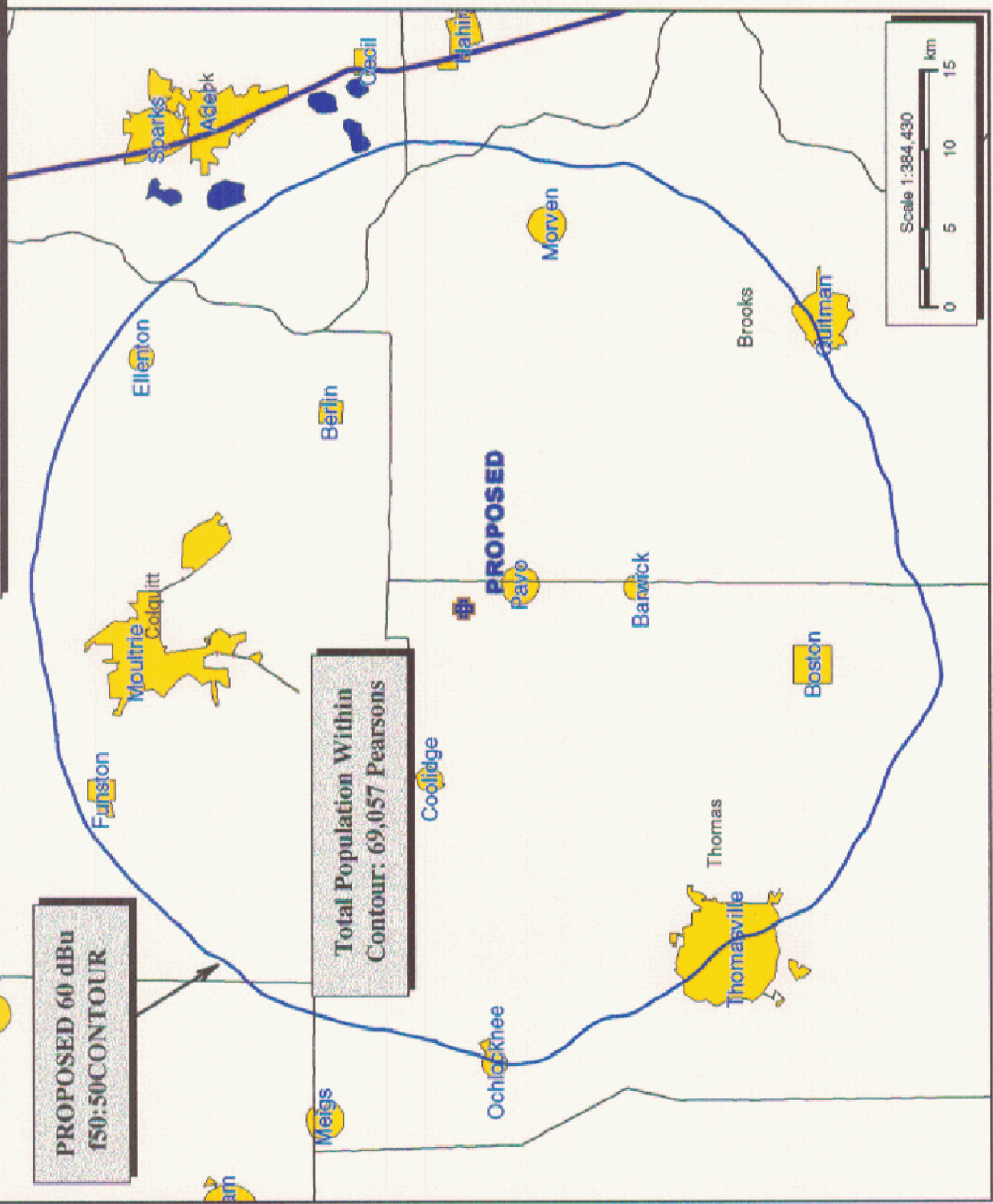
Latitude: 30-59-30 N  
 Longitude: 083-45-12 W  
 ERP: 6.00 kW  
 Channel: 252  
 Frequency: 98.3 MHz  
 AMSL Height: 171.59 m  
 Elevation: 76.1 m  
 Horiz. Pattern: Omni  
 Vert. Pattern: No  
 Prop Model: None

## PROPOSED 70 dBu CONTOUR

## PROPOSED CITY OF LICENSE

## EXHIBIT - 2

# EME COMMUNICATIONS - MOULTRIE, GA.



**PROPOSED 60 dBu  
150:500CONTOUR**

**Total Population Within  
Contour: 69,057 Pearsons**

**PROPOSED**  
**COOLIDGE, GEORGIA**  
 Latitude: 30-59-30 N  
 Longitude: 083-45-12 W  
 ERP: 6.00 kW  
 Channel: 252  
 Frequency: 98.3 MHz  
 AMSL Height: 171.59 m  
 Elevation: 76.1 m  
 Horiz. Pattern: Omnidirectional  
 Vert. Pattern: None  
 Prop Model: None

**EXHIBIT - 2A**





**U.S. Census Bureau**  
**American FactFinder**

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### **DP-1. Profile of General Demographic Characteristics: 2000**

Data Set: [Census 2000 Summary File 1 \(SF 1\) 100-Percent Data](#)


Geographic Area: **Coolidge city, Georgia**

NOTE: For information on confidentiality protection, nonsampling error, and definitions, see <http://factfinder.census.gov/home/en/datnotes/expsf1u.htm>.

Subject	Number	Percent
<b>Total population</b>	<b>552</b>	<b>100.0</b>
<b>SEX AND AGE</b>		
Male	245	44.4
Female	307	55.6
Under 5 years	31	5.6
5 to 9 years	56	10.1
10 to 14 years	34	6.2
15 to 19 years	39	7.1
20 to 24 years	31	5.6
25 to 34 years	64	11.6
35 to 44 years	89	16.1
45 to 54 years	69	12.5
55 to 59 years	21	3.8
60 to 64 years	27	4.9
65 to 74 years	39	7.1
75 to 84 years	38	6.9
85 years and over	14	2.5
Median age (years)	37.2	(X)
18 years and over	405	73.4
Male	169	30.6
Female	236	42.8
21 years and over	385	69.7
62 years and over	105	19.0
65 years and over	91	16.5
Male	28	5.1
Female	63	11.4
<b>RACE</b>		
One race	552	100.0
White	311	56.3
Black or African American	226	40.9
American Indian and Alaska Native	1	0.2
Asian	8	1.4
Asian Indian	5	0.9
Chinese	0	0.0
Filipino	0	0.0
Japanese	0	0.0
Korean	0	0.0
Vietnamese	3	0.5
Other Asian <sup>1</sup>	0	0.0
Native Hawaiian and Other Pacific Islander	0	0.0
Native Hawaiian	0	0.0
Guamanian or Chamorro	0	0.0
Samoan	0	0.0
Other Pacific Islander <sup>2</sup>	0	0.0

I hereby certify a copy of this proposal was sent via 1<sup>st</sup> class mail to the address listed below on March 17, 2004.

Dan J Albert  
120 N 21<sup>st</sup> Road  
Arlington, VA. 22201

A handwritten signature in dark ink, appearing to read 'Clyde Scott, Jr.', with a stylized, cursive script.

Clyde Scott, Jr.  
EME Communications.